

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES	)	
OF AMERICA	)	
	)	
	)	
	)	CRIMINAL NO. 05CR 40025 FDS
V.	)	
	)	
MATTHEW MARSH,	)	
Defendant,	)	
_____	)	

MOTION FOR FURTHER DISCOVERY PER LOCAL RULE 116.1(D)

Now comes the defendant in the above-entitled indictment and requests this Honorable Court for the following further discovery regarding four confidential percipient witnesses, which the government has represented in their discovery disclosures will be used as witnesses if this case was to go to trial.

1. A copy of all Grand Jury minutes of these four witnesses generated from the indictment of the defendant and co-defendants in which these witnesses have testified.
2. A copy of all previously recorded testimony of these four confidential witnesses where they have testified for the United States or any governmental agency.
3. A history of these witnesses cooperation with the United States and any other governmental agency including a listing of previous rewards and inducements received for these prior cases.
4. A transcription of ALL tapes of ALL conversations of these four confidential witnesses related to the investigation of this matter.
5. Disclosure of confidential witnesses names and addresses pursuant to Roviaro v. United States, 353 U.S. 53 (1957).
6. The full record of arrests and convictions of these four witnesses including whether this witness is currently under investigation for any violations of state or federal law.
7. Any promises, rewards and or inducements of any kind.

8. The identities of all witnesses who have been offered immunity by the Government.

9. The record of any law enforcement agency, federal, state or local, which pertain to the criminal activity, arrest and/or conviction of these four witnesses.

10. The defendant requests that the Government preserve for trial any original notes taken by any of its investigating law enforcement and/or DEA and FBI agents of any interviews with these four persons who will be witnesses at trial.

11. The defendant requests that the Government provide defense with this material immediately so that the defendant can adequately prepare for trial and the defendant's constitutional rights to due process not be violated.

WHEREFORE, the defendant prays that this Motion be granted and that disclosure pursuant to Local Rule 116.1(a)(7) be granted.

Respectfully submitted,

THE DEFENDANT

By: /s/ Alan J. Black  
ALAN JAY BLACK, His Attorney  
1383 Main Street  
Springfield, MA 01103  
(413) 732-5381  
BBO# 553768